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Attorney for Richard J. Chase

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

V.

RICHARD J. CHASE,

Defendant.

Case Nos. 2:18-cr-00250-JCM-NJK
2:16-cr-171-GMN-CWH
2:10-cr-00568-GMN-PAL

**STIPULATION TO CONTINUE
SENTENCING HEARING
(Second Request)**

It is stipulated and agreed to by Federal Public Defender Rene L. Valladares and Assistant Federal Public Defender Sylvia A. Irvin, counsel for Richard J. Chase, and United States Attorney Nicholas A. Trutanich and Assistant United States Attorney Daniel Cowhig, counsel for the United States of America, that the Sentencing and Revocation Hearing currently scheduled on March 15, 2019, at 10:00 a.m., be vacated and continued to a date and time convenient to the Court, but no sooner than sixty (60) days.

This Stipulation is entered into for the following reasons:

1. This is a request by counsel for the Defendant Richard J. Chase. Counsel for the Government agrees to the request.

1 2. The additional time requested by this Stipulation is reasonable pursuant to
2 Federal Rule of Criminal Procedure 32(b)(2), which states that the “court may, for good cause,
3 change any time limits prescribed in this rule.”

4 3. Defense counsel asks for the additional time because Mr. Chase would like his
5 mother to be present for the hearing. She was injured several months ago and is still going
6 through physical therapy. As a result of the injury, she lost her job and is relying on friends to
7 help. The additional time helps her have time to plan to be present for the hearing.

8 4. Defense counsel also asks for additional time because Mr. Chase has been
9 working and taking classes at Nevada Southern Detention Center. He would like to use this
10 requested time to continue to work and complete some of those classes.

11 5. This additional time will also allow both counsel adequate time to research
12 sentencing issues, file sentencing objections and memoranda, and to prepare for the sentencing
13 hearing.

14 6. The Defendant is in custody and agrees with the need for the continuance.

15 7. The parties agree to the continuance.

16 8. This is the second request for a continuance of the sentencing hearing.

17 DATED this 8th day of March, 2019.

19 RENE L. VALLADARES
20 Federal Public Defender

NICHOLAS A. TRUTANICH
United States Attorney

21 By: Sylvia A. Irvin

22 SYLVIA A. IRVIN
23 Assistant Federal Public Defender

By: Daniel J. Cowhig

DANIEL J. COWHIG
Assistant United States Attorney

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ORDER

RICHARD J. CHASE

Defendant.

IT IS ORDERED that the Sentencing and Revocation Hearing currently scheduled for Friday, March 15, 2019, at 10:00 a.m., be vacated and continued to May 22, 2019, at the hour of 10:00 a.m.

DATED March 8, 2019.

UNITED STATES DISTRICT JUDGE